

REMARKS/ARGUMENTS

Prior to this Amendment, claims 1, 2, 4-21, and 23-41 were pending. In the Office Action, the Examiner rejected claims 1, 9, 20, 28, and 39 under obviousness-type double patenting over claims of co-pending application 10/214,380. While Applicants do not agree with the priority of the double patenting rejection, Applicants hereby cancel claims 1-10, 20-29, and 39 to advance prosecution in the present application. Therefore, claims 11-19, 30-38, 40, and 41 are now pending. Claims 11, 19, 30, 38, 40, and 41 are independent claims.

In the Office Action, the Examiner rejected independent claims 11 and 30 under 35 U.S.C. §102(a) as being anticipated by Acrobat Reader ("Acrobat"). Claims 12, 13, 17, 18, 31, 32, 36, and 37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Acrobat. Claims 14, 15, 19, 33-34, 38, and 40-41 were rejected under 35 U.S.C. §103(a) as being unpatentable over Acrobat, further in view of Nielsen (U.S. patent number 6,339,437) and Hart (U.S. patent number 5,546,502). Claims 16 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Acrobat, further in view of Nielsen, Hart, and Okamoto (U.S. patent publication number 2002/0065814).

Applicants respectfully traverse with respect to the amended claims.

Independent Claim 11

Claim 11 as currently amended now includes, "receiving user input of a selection of a first concept from a set of concepts," "extracting one or more text entities" from a document, and "determining if the one or more text entities are relevant to the first concept, wherein *the determination is independent of a user selection of a second concept from the set of concepts.*" Such amendments are supported in the specification at least at page 5, line 5 through page 9, line 19. For example, as shown in FIG. 4C of the present application, an identification of text entities relevant to a user selection of the defined concept "Dogs" would be independent of an identification of text entities relevant to a user selection of the defined concept "Machine Learning" or "Expert Systems."

An advantage of amended claim 11 is that, as depicted in FIG. 4C, a user can define a set of concepts and select a first concept from the set of concepts. Text entities are determined as relevant to the first concept, and the determination is independent of a selection of a second concept from the set of concepts.

At page 5 of the Office Action, the Examiner rejected independent claim 11 under 35 U.S.C. §102(a) as being anticipated by Acrobat Reader ("Acrobat"). Applicants submit that the rejection of claim 11 is moot in view of amendments to claim 11. As the Examiner stated at page 14 of the Office Action with respect to the rejection of previously submitted claim 14 (which is now incorporated into claim 11), neither Acrobat nor Nielsen disclose a user selecting from a plurality of concepts.

Applicants further submit that amended claim 11 is not obvious over Acrobat, further in view of Nielsen, Hart, and Okamoto. In the obviousness rejection of previously submitted claim 14 (now incorporated into claim 11), the Examiner stated, "Hart discloses a method in which a user selects concepts (symptoms) and the system searches for the concepts and commonly known keywords (faults) associated with the concepts..."

Applicants find a number of distinctions between "concepts" of claim 11 and faults or symptoms of Hart, as described further below. Further, in contrast to amended claim 11, Hart does not teach or suggest "determining if the one or more text entities are relevant to the first concept, wherein *the determination is independent of a user selection of a second concept from the set of concepts.*"

In Hart, an expert system determines possible faults (e.g., of a copier) based upon a *sequence* of symptoms entered by a user. The *sequence* of symptoms forms a "context" which reflects a current state so the expert system can locate relevant information pertaining to the individual symptoms which make up that context.

In Hart, the probability that a particular fault will be computed as relevant to a particular symptom depends upon previous and *subsequent* symptoms selected by the user. Hart states, "[f]aults in the runtime system system are presented...based on their individual conditional probabilities *given all symptoms observed thus far,*" col. 7, lines 43-46, *emphasis added*. Hart defines "an activation predicate (AP) by which the system decides whether a fault is

part of the 'active' set of top contenders [so that] *the current set of top fault contenders can change after each instantiation of new symptoms,*" col. 7, lines 53-57, *emphasis added.* "In Hart, "each time a new symptom is recorded, the faults which have a strong relationship with this symptom will increase in likelihood," col. 7 lines 58-61. In addition, Hart defines a support group predicate," based on a ΔP_{ij} matrix. The ΔP_{ij} matrix represents *the difference between the probability of each fault before and after a new symptom was entered,*" col. 8, lines 52-55, *emphasis added.* Compare FIG. 5 and FIG. 6 of Hart, which shows a change of probability of various faults before and after a subsequent addition of a particular symptom.

Therefore, Applicants submit that Hart does not teach or suggest "determining if the one or more text entities are relevant to the first concept, wherein *the determination is independent of a user selection of a subsequent second concept from the set of concepts,*" as recited in amended claim 11. The other cited references do not cure this deficiency.

In addition, Hart teaches away from several features of amended claim 11. Amended claim 11 now includes "associating *each* text entity that is relevant to the first concept with style information for the first concept." In contrast, Hart rank-orders and discounts (or ignores) low probability faults. Hart states, "[f]aults in the runtime system are presented as a ranked list based on their individual conditional probabilities given all symptoms observed thus far... [So that] the user is able to distinguish between the real contenders and the low probability faults which have little significance...*our system targets only the top contenders* [faults] to provide automatic documentation for the faults," col. 7 lines 43-52, emphasis added. Therefore, Hart teaches away from "associating *each* text entity" as relevant to a concept.

Furthermore, *Hart teaches away from providing full-text searching as provided in Nielsen and Okamoto.* Hart states,

[O]ur system eliminates the user having to construct a query and the system having to understand it. Typically, the user of our system never stops to enter a query. The appropriate query has already been constructed and parsed, and the relevant information retrieved. Second, *our system eliminates the parse failures which commonly occur when users attempt to construct queries directly.* Our system never has to deal with "novel" queries because of the control utilized at development time over how to properly construct an input sequence. Finally, *our system simplifies the process of matching queries and table of contents*

topics. Because the system is well defined in terms of how topics and queries are parsed and represented, the matching becomes simpler.
Hart, col. 5, lines 50-64, emphasis added.

Therefore, Hart teaches away from providing full-text searches of the sort provided by Nielsen and Okamoto. Because Hart teaches away from associating each text entity relevant to a concept, and teaches away from providing full text searching, Applicants assert that a person of ordinary skill in the art would not combine Hart with the other references in a manner suggested by the Examiner. As such, Applicants submit that amended claim 11 is not made obvious thereby. Applicants thus submit that amended claim 11 is allowable over Acrobat, Nielsen, Hart, and Okamoto, and is in a condition for allowance.

Independent Claims 19, 30, 38, 40, and 41

Claims 19, 30, 38, 40, and 41 were rejected under 35 U.S.C. §103(a) as being unpatentable over Acrobat, further in view of Nielsen and Hart. However, independent claims 38, 40, and 41 recite, in one form or another, "receiving user input of a selection of a first concept from a set of concepts," "extracting one or more text entities" from a document, and "determining if the one or more text entities are relevant to the first concept, wherein *the determination is independent of a user selection of a second concept from the set of concepts.*". As stated above with respect to claim 11, Applicants submit that Acrobat, Nielsen, Hart, Okamoto and the combination thereof fail teach or suggest such limitations. Applicants submit that for similar reasons stated above with respect to independent claim 11, among others, claims 19, 30, 38, 40, and 41 are patentable and are in a condition for allowance. These claims also recite additional features that make the claims patentable for additional reasons.

Dependent Claims

Claims 12-18 and 31-37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Acrobat, further in view of one or more of Nielsen, Hart, and Okamoto. However, these claims depend directly or indirectly from, and inherit all limitations of, claims 11 and 30. As noted above, Acrobat, Nielsen, Hart, Okamoto and the combination thereof do not teach or suggest all limitations of the independent claims, and therefore the dependent claims cannot be obvious.

Further, the dependent claims add other limitations not found in the cited references. For example, claim 14, as amended, includes "each concept in the set of concepts is specified as a set of keywords belonging to the concept." As stated in the specification, a Bayesian belief network may be used to specify the concept based on keywords. For example as shown in FIG. 4C of the instant application, a single user-specified concept ("Machine Learning") includes a number of subconcepts ("Genetic Algorithms," "Neural Networks," and "Machine Translation"), which subconcepts are specified by a set of keywords ("genetic algorithms," "Santa Fe Institute," "Paul W. Klonowski," ...). A benefit of this arrangement is that presence of any of the keywords (e.g., genetic algorithms) in a document will be displayed to the user with style information associated with the concept (e.g., Machine Learning).

In contrast, in Hart, a symptom is not *specified by* a fault. Instead, the expert system computes the probability of a fault based on the sequence of symptoms observed and entered by the user.

Applicants therefore assert that the cited references do not teach or suggest all limitations of the dependent claims. Applicants submit that claims 12-18 and 31-37 are patentable over Acrobat, Nielsen, Hart and Okamoto, and are in a condition for allowance.

Appl. No. 09/636,039
Amdt. dated April 3, 2006
Reply to Final Office Action of November 1, 2005

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



Eric J. Worthington
Reg. No. 50,910

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 650-326-2400
Fax: 650-326-2422
EJW:am
60725424 v1